

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re FIRSTENERGY CORP. SECURITIES LITIGATION) Case No. 2:20-cv-03785-ALM-KAJ
)
) CLASS ACTION

This Document Relates To:)
ALL ACTIONS) Judge Algenon L. Marbley
) Magistrate Judge Kimberly A. Jolson
) Special Master Shawn K. Judge
)

DEFENDANT FIRSTENERGY CORP.'S DEPOSITION STATUS REPORT

I. DEPOSITIONS

A. Noticed and Scheduled Depositions

January 2025

Date	Deponent	Location and Time	Noticing Party
01/09/2025	Non-Party Laura Campos	7:00 a.m. PT 10:00 a.m. ET Robbins Geller - 420 Lexington Ave. Suite 1832 New York, NY 10170 In-person/Remote	Plaintiffs ¹ <i>*09/30/2024 amended notice and amended subpoena</i>

February 2025

Date	Deponent	Location and Time	Noticing Party
02/27/2025	Non-Party Twin Capital Management LLC (Geoff Gerber)	6:30 a.m. PT 9:30 a.m. ET Dickie, McCamey & Chilcote 4 Gateway Center 444 Liberty Avenue Suite 1000 Pittsburgh, PA 15222 In-person/Remote	Defendant FirstEnergy Corp. <i>*02/10/2025 notice and amended subpoena</i>

¹ Plaintiffs are Class Representatives Los Angeles County Employees Retirement Association, Amalgamated Bank, as Trustee for the LongView LargeCap 500 Index Fund, LongView Quantitative LargeCap Fund, LongView Broad Market 3000 Index Fund, LongView LargeCap 500 Index Fund VEBA, LV LargeCap 1000 Value Index Fund, LongView Quantitative MidCap Fund, LongView Quant LargeCap Equity VEBA Fund and LongView Core Plus Fixed Income Fund, City of Irving Supplemental Benefit Plan, and Wisconsin Laborers' Pension Fund (collectively, "Plaintiffs").

March 2025

Date	Deponent	Location and Time	Noticing Party

April 2025

Date	Deponent	Location and Time	Noticing Party
04/01/2025	Non-Party Intech Investment Management LLC	6:30 a.m. PT 9:30 a.m. ET Veritext 1400 Centrepark Blvd, Ste. 605, West Palm Beach, FL 33401 In-person/Remote	Defendant FirstEnergy Corp. <i>*02/28/2024 amended notice and subpoena</i>
04/23/2025	Non-Party PGIM Quantitative Solutions LLC (f/k/a QMA, LLC)	6:30 a.m. PT 9:30 a.m. ET Veritext 290 W. Mount Pleasant Ave Ste. 3200 Livingston, NJ 07039 In-person/Remote	Defendant FirstEnergy Corp. <i>*03/28/2025 notice and amended subpoena</i>

B. Noticed Depositions with No Date Set/Target Period

Date/Target Period	Deponent	Location and Time	Noticing Party
No Date Set No Target Period	Defendant Donald Misheff	TBD	Defendant Charles E. Jones <i>*amended notice forthcoming</i>
No Date Set No Target Period	Defendant Donald R. Schneider	TBD	Defendant Charles E. Jones <i>*amended notice forthcoming</i>
No Date Set No Target Period	Defendant Leila L. Vespoli	TBD	Defendant Charles E. Jones <i>*amended notice forthcoming</i>
No Date Set No Target Period	Defendant Robert P. Reffner	TBD	Defendant Michael J. Dowling <i>*amended notice forthcoming</i>
No Date Set No Target Period	Non-Party Allspring Global Investments LLC/Wells Capital Management Inc.	TBD	Defendant FirstEnergy Corp. <i>*10/01/2024 notice and subpoena</i>
No Date Set No Target Period	Non-Party BlackRock Institutional Trust Company	TBD	Defendant FirstEnergy Corp. <i>*10/01/2024 notice and subpoena</i>
No Date Set No Target Period	Non-Party Boston Partners/BNY Mellon Asset Management North America Corp.	TBD	Defendant FirstEnergy Corp. <i>*10/01/2024 notice and subpoena</i>
No Date Set No Target Period	Non-Party Bowling Portfolio Management LLC	TBD	Defendant FirstEnergy Corp. <i>*10/01/2024 notice and subpoena</i>
No Date Set No Target Period	Non-Party Bradley Bingaman	TBD	Defendants Michael J. Dowling and Charles E. Jones <i>*amended notice and subpoena forthcoming</i>

Date/Target Period	Deponent	Location and Time	Noticing Party
No Date Set No Target Period	Non-Party Capital Alpha Partners	TBD	Defendant FirstEnergy Corp. <i>*02/10/2025 notice and subpoena</i>
No Date Set ² No Target Period	Non-Party Charles “Chuck” Moore	TBD	Defendant Donald Schneider <i>*amended notice forthcoming</i>
No Date Set No Target Period	Non-Party Clearview Energy Partners, LLC	TBD	Defendant FirstEnergy Corp. <i>*02/10/2025 notice and subpoena</i>
No Date Set No Target Period	Non-Party Corient Holdings Inc.	TBD	Defendant FirstEnergy Corp. <i>*10/29/2024 served notice and subpoena</i>
No Date Set No Target Period	Non-Party Ebony Yeboah Amankwah	TBD	Defendant Michael J. Dowling <i>*amended notice and subpoena forthcoming</i>
No Date Set No Target Period	Non-Party Federated Hermes, Inc.	TBD	Defendant FirstEnergy Corp. <i>*10/01/2024 notice and subpoena</i>
No Date Set No Target Period	Non-Party Glenrock Associates LLC	TBD	Defendant FirstEnergy Corp. <i>*02/10/2025 notice and subpoena</i>
No Date Set No Target Period	Non-Party Invesco Ltd.	TBD	Defendant FirstEnergy Corp. <i>*1/30/2025 served notice and subpoena</i>

² As noted in Plaintiffs’ Weekly Deposition Status Report, “During the Parties’ April 8, 2025 meet-and-confer, Plaintiffs consented to scheduling Charles Moore’s deposition at a later date (due to ongoing document disputes) even if Defendants have already exhausted their 23 non-party deposition limit at that time.” (See ECF No. 775 at PageID 17776.)

Date/Target Period	Deponent	Location and Time	Noticing Party
No Date Set Target Period: April 11, 2025 – May 02, 2025	Non-Party Jonathan Grabel ³	TBD	Defendant FirstEnergy Corp. <i>*03/21/2025 served notice</i>
No Date Set No Target Period	Non-Party Josh Rubin	TBD	Defendants Charles E. Jones and Michael Dowling <i>*10/29/2024 email</i>
No Date Set No Target Period	Non-Party J.P. Morgan Investment Management Inc.	TBD	Defendant FirstEnergy Corp. <i>*10/11/2024 notice and subpoena</i>
No Date Set No Target Period	Non-Party Justin Biltz	TBD	Defendants Michael J. Dowling and Charles E. Jones <i>*amended notice and subpoena forthcoming</i>
No Date Set No Target Period	Non-Party Loomis, Sayles & Company, L.P.	TBD	Defendant FirstEnergy Corp. <i>*10/01/2024 notice and subpoena</i>
No Date Set No Target Period	Non-Party Matthew Brakey	TBD	Defendant Charles E. Jones <i>*amended notice and subpoena forthcoming</i>

³ Under applicable case law, although Mr. Grabel is not a Named Plaintiff, his deposition is a “party” deposition under Federal Rule of Civil Procedure 30, as opposed to a “non-party” deposition, because he is a current officer of Lead Plaintiff Los Angeles County Employees Retirement Association (“LACERA”)—Mr. Grabel is LACERA’s Chief Investment Officer and is a member of LACERA’s Executive Team. *See Garcia v. Serv. Emps. Int’l Union*, 2018 WL 10721077, at *1 (D. Nev. Sept. 21, 2018) (“In the context of a corporate party, a natural person is deemed a party for Rule 30(b)(1) notice purposes if that person is the party’s officer, director, or managing agent.”); *E.E.O.C. v. Honda of Amer. Mfg., Inc.*, 2007 WL 682088, at *2 (S.D. Ohio Feb. 28, 2007) (a deponent is a non-party if “the witness is not an officer, director, or managing agent of a corporate opponent.”). Accordingly, on March 21, 2025, FirstEnergy noticed his deposition as a party deposition pursuant to Rule 30(b)(1) of the Federal Rules of Civil Procedure, as opposed to issuing a non-party subpoena pursuant to Rule 45. Plaintiffs have challenged the designation of Mr. Grabel as a “party” for deposition purposes. On April 8, 2025, Plaintiffs informed FirstEnergy that they would be filing their own weekly deposition status report until the Special Master decides this dispute, necessitating the filing of this separate deposition status report.

Date/Target Period	Deponent	Location and Time	Noticing Party
No Date Set No Target Period	Non-Party Matthew Richlovsky	TBD	Defendant Charles E. Jones <i>* amended notice and subpoena forthcoming</i>
No Date Set No Target Period	Non-Party Newton Investment Management North America, LLC	TBD	Defendant FirstEnergy Corp. <i>*12/05/2024 notice and subpoena</i>
No Date Set No Target Period	Non-Party Pacific Investment Management Company LLC	TBD	Defendant FirstEnergy Corp. <i>*10/01/2024 notice and subpoena</i>
No Date Set No Target Period	Non-Party Pugh Capital Management, Inc.	TBD	Defendant FirstEnergy Corp. <i>*10/01/2024 notice and subpoena</i>
No Date Set No Target Period	Non-Party RREEF America L.L.C.	TBD	Defendant FirstEnergy Corp. <i>*10/01/2024 notice and subpoena</i>
No Date Set No Target Period	Non-Party Santino Fanelli	TBD	Defendant Charles E. Jones <i>*amended notice and subpoena forthcoming</i>
No Date Set No Target Period	Non-Party State Street Global Advisors Inc.	TBD	Defendant FirstEnergy Corp. <i>*11/07/2024 served notice and subpoena</i>
No Date Set No Target Period	Non-Party State Street Bank and Trust Company	TBD	Defendant FirstEnergy Corp. <i>*03/10/2025 served notice and subpoena</i>
No Date Set No Target Period	Non-Party Steven Staub	TBD	Defendant Charles E. Jones <i>*amended notice and subpoena forthcoming</i>
No Date Set No Target Period	Non-Party The Bank of New York Mellon Corp.	TBD	Defendant FirstEnergy Corp. <i>*11/04/2024 served notice and subpoena</i>

Date/Target Period	Deponent	Location and Time	Noticing Party
No Date Set No Target Period	Non-Party Wells Fargo Clearing Services, LLC	TBD	Defendant FirstEnergy Corp. *12/20/2024 served notice and subpoena
No Date Set No Target Period	Non-Party Western Asset Management Company	TBD	Defendant FirstEnergy Corp. *10/01/2024 notice and subpoena

Dated: April 8, 2025

Respectfully submitted,

/s/ Paul J. Schumacher

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CERTIFICATE OF SERVICE

I certify that the foregoing was filed electronically on April 8, 2025. Notice of this filing will be sent to all electronically registered parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Paul J. Schumacher
Paul J. Schumacher (0014370)

Counsel for Defendant FirstEnergy Corp.